



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

VIA ECFS

June 30, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, S. W.
Washington, D.C. 20554

RE: Submission of information Pursuant to FCC 54.313 Rules and Request for Confidential Treatment – ETC Annual Reports and Certifications WC Docket Nos. 10-90 and 14-58

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Lavaca Telephone Company, Inc. ("Lavaca"), Arkansas, Study Area Code 401704, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 14-58. Lavaca, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan information identified on Form 100, Line 112 and (2) the financial annual report identified on Form 3005, both of which were redacted in the ECFS submission. The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 Protective Order in WC Docket Nos. 10-90 and 14-58. The financial reports contain competitively sensitive data that is not otherwise available from publically available sources. The request for confidential treatment of the five-year plan information is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). Lavaca keeps this information strictly confidential and it is subject to protection under the Freedom of Information Act (FOIA) and the Commission's implementing rules. Release of this information would have a substantial negative impact on the Company.

Lavaca is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

Lavaca requests that the information contained in its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company. Lavaca offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's future network plans and information concerning future services provided to customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan and associated progress reports contain information on the Company's future plans, number of customers served and other planning information that company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's strategic plans. This would provide competitors access to confidential information they could employ to develop their own plans a particular service area. This could cause competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated information regarding its network and service plans as confidential and carefully controls the information to protect it from competitors.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The five year planning period information would provide valuable information to competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,



Tim Morrissey

President

314-605-9220

tmorrissey@fwainc.com

Enclosures

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	JOHN ZEILER
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4796742211 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	JOHNZ@PINNCOM.COM
	Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	401704
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<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

401704AR112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets
 <114> Report how much universal service (USF) support was received
 <115> How much (USF) was used to improve service quality and how support was used to improve service quality
 <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
 <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
<035>	Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
<035>	Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
401704AR510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	401704
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<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
<035>	Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	401704AR610.pdf

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
<035>	Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

-- See attached worksheet

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

-- See attached worksheet --

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
<035>	Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 401704AR1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<015>	Study Area Name	LAVACA TEL CO-AR
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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://pinncom.com/uploads/docs/pc-ar-lifeline-authorization.pdf>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2000) Price Cap Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

**(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	401704AR3010b.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	401704AR3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	401704
<015>	Study Area Name	LAVACA TEL CO-AR
<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
--	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
<035> Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/29/2016
Printed name of Authorized Officer: Michael Gibson	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 4796742211 ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	401704
<015> Study Area Name	LAVACA TEL CO-AR
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
<035> Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>FRED WILLIAMSON & ASSOCIATES, INC.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	FRED WILLIAMSON & ASSOCIATES, INC.
Name of Reporting Carrier:	LAVACA TEL CO-AR
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	401704 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	LAVACA TEL CO-AR
Name of Authorized Agent Firm:	FRED WILLIAMSON & ASSOCIATES, INC.
Signature of Authorized Agent or Employee of Agent:	Date: 06/29/2016
Name of Authorized Agent Employee:	TOM KARALIS
Title or position of Authorized Agent or Employee of Agent	CONSULTANT
Telephone number of Authorized Agent or Employee of Agent:	9182981618 ext.
Study Area Code of Reporting Carrier:	401704 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<015>	Study Area Name	LAVACA TEL CO-AR
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<020>	Program Year	2017
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<030>	Contact Name - Person USAC should contact regarding this data	JOHN ZEILER
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4796742211 ext.
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<039>	Contact Email Address - Email Address of person identified in data line <030>	JOHNZ@PINNCOM.COM
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<702> Single State-wide Residential Local Service Charge

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<015>	Study Area Name	LAVACA TEL CO-AR
-------	-----------------	------------------

<030> Contact Name - Person USAC should contact regarding this data JOHN ZEILER

<039> Contact Email Address - Email Address of person identified in data line <030> JOHNZ@PINNCOM.COM

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
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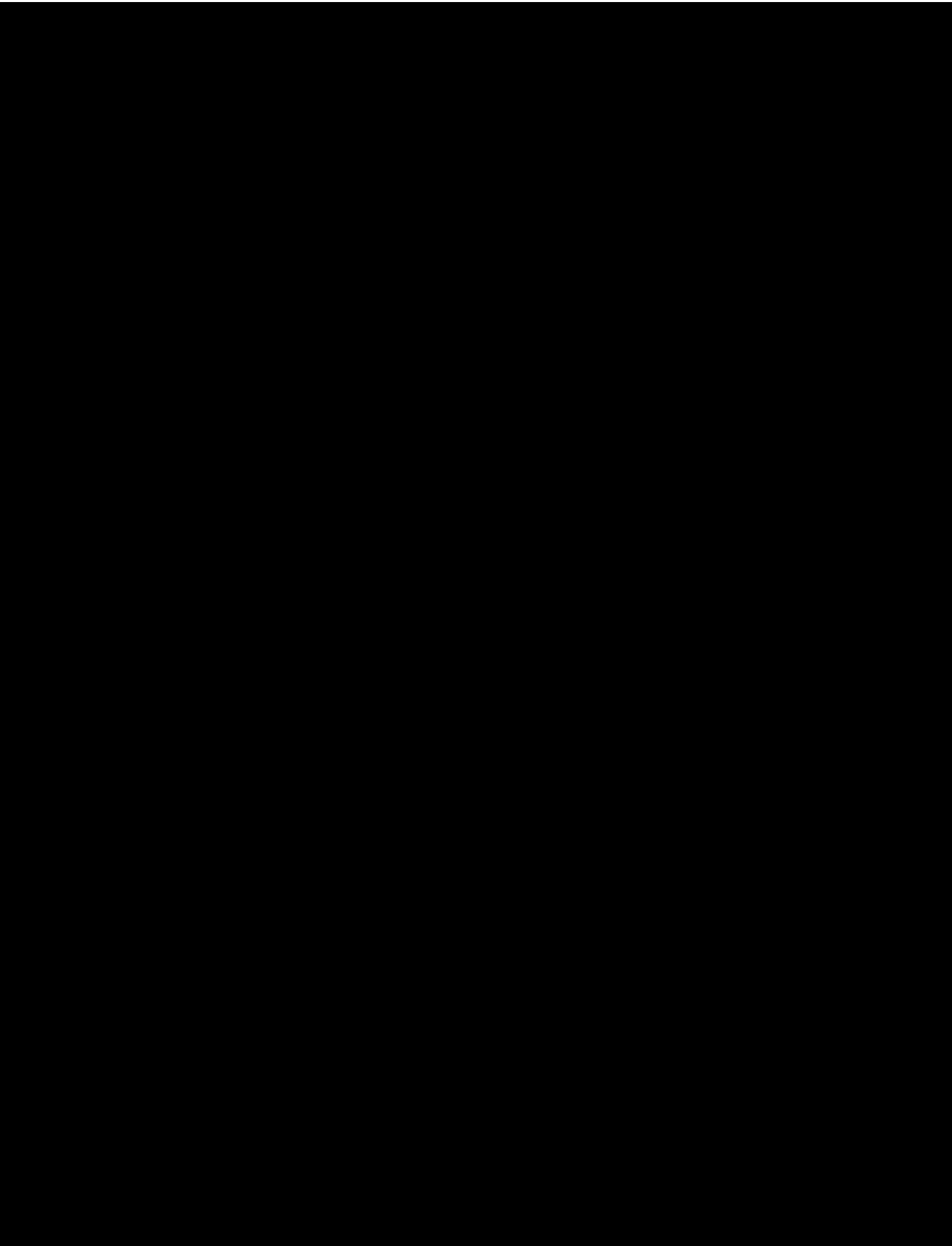
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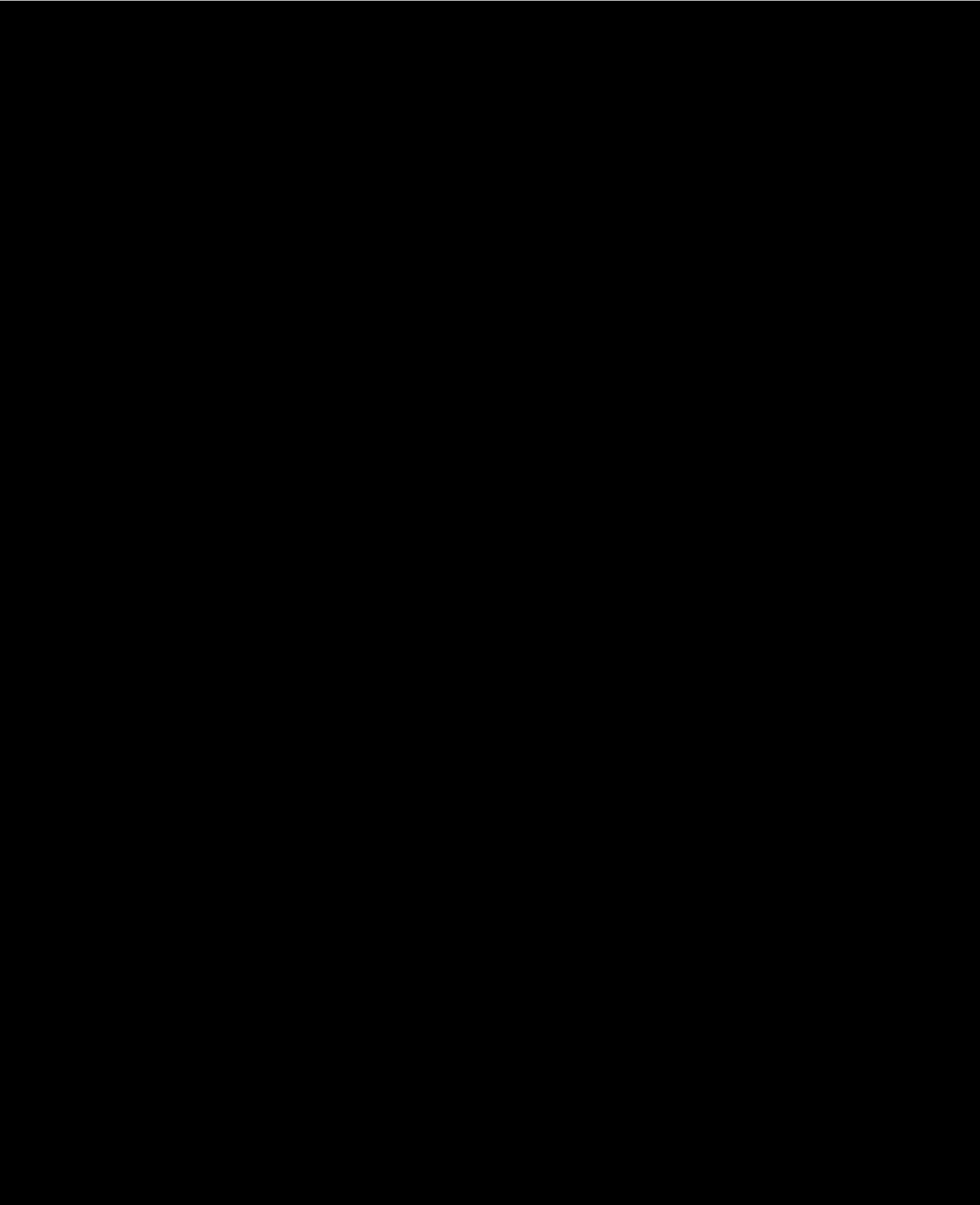
(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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July 2013

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LAVACA TELEPHONE COMPANY, INC.
FIVE-YEAR QUALITY IMPROVEMENT PLAN
(USAC DOCUMENT - 401704AR112.PDF)





REDACTED - FOR PUBLIC INSPECTION

GREATER THAN 4MB
BROADBAND CAPABILITY

REDACTED FOR PUBLIC INSPECTION

REMOTE
LOCATION

FCC 481 2016 PROGRESS REPORT MAP
SCALE: NOT TO SCALE
DATE: 06-2016

LAVACA TELEPHONE COMPANY, INC.

QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS

(USAC DOCUMENT - 401704AR510.PDF)

LAVACA TELEPHONE COMPANY - ARKANSAS
QUALITY OF SERVICE & CUSTOMER'S PROTECTION PROCESS

1. Available Customer Service Representatives to Answer Phones

95% of all calls received by Lavaca Telephone Company - Arkansas during business hours are answered by the third ring. When the assigned customer representatives are unable to answer calls by the third ring, calls are answered by our voice mail system and calls are returned to customers within the hour.

2. Provide After Hours Emergency Customer Service

Calls are answered within 60 seconds by our voice mail system. Calls are reviewed the following day by personnel. Customer service representatives have been given a list of questions by Lavaca Telephone Company - Arkansas to ask to assist them in resolving many issues. Unresolved issues are worked on that day. Issues requiring immediate attention are sent to the Lavaca Telephone Company - Arkansas service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. After hours customer service is also available.

3. Provide a 24/7 Internet Help Desk Service

All calls are answered within 60 seconds. Managers are available as necessary to review and address any issues.

4. Give Customers Cut-Off Warnings & Provide Bill Arrangement Opportunities

Customers are given two months of missed payments before phone service is cut off. Notification of the payment due date and the cut-off date are prominently displayed on bills as well as of the opportunity to make payment arrangements to avoid being cut-off.

A customer service representative will attempt to call a customer in danger of losing phone service to remind them of the late payment. Account balance reports are printed monthly using the company's billing system.

5. Ensure That All New Service Installation Orders Are Fulfilled Promptly

All customers are contacted within 48 hours regarding scheduling the new service installation. If outside plant is already in place, the order is filled at the customers' earliest convenience; if outside plant is not in place, the order is filled as soon as the weather permits.

6. Minimize Customer Downtime for Services & Make Requested Changes Promptly

Customers are contacted regarding all service requests that same day, with a goal of resolving all issues within 48 hours. Any unresolved issues will be resolved contingent on the technician/customer coordination of access to the premises.

7. Proactively Monitoring in Case of Major Service Outages

Service technicians will be made aware of outages affecting customers within an hour. It is the goal of Lavaca Telephone Company - Arkansas to resolve major outages in four hours or less. If an outage has not been resolved within four hours, technicians will begin utilizing all resources to resolve the outage.

CUSTOMER PRIVACY

Company Confidential Information Policy

Lavaca Telephone Company - Arkansas has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information.

The policy states: *"You are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge".*

Company CPNI Policy

Lavaca Telephone Company - Arkansas has a Customer Proprietary Network Information (CPNI) policy in place that ensures employees compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that "failure to protect this information may result in disciplinary action up to and including discharge for the responsible employee."

As a part of the policy, Lavaca Telephone Company - Arkansas has designated a Compliance Officer responsible for assuring training of employees, monitoring CPNI related activities, and reporting breaches.

LAVACA TELEPHONE COMPANY, INC.

EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER

(USAC DOCUMENT - 401704AR610.PDF)

LAVACA TELEPHONE COMPANY, INC., - ARKANSAS
EMERGENCY SITUATION FUNCTIONALITY
AVAILABILITY OF BACK-UP POWER

Lavaca Telephone Co. Inc., d.b.a. Pinnacle Communications has one central office switch and one remote location within its service area. Each of these locations is equipped with a backup battery supply as well as a generator capable of providing power to the equipment within that office in the event of an external power source outage. After a power outage, the generators are inspected and are also professionally serviced biannually to ensure functionality.

In addition, Lavaca Telephone Co. Inc., - Arkansas has installed back-up batteries on the customer premise equipment. Spare batteries are kept at Lavaca Telephone Co. Inc., - Arkansas' main office for replacement of batteries at customer homes in the event of a prolonged power outage.

TRAFFIC ROUTING

Voice traffic between the central office switch and remote is carried across fiber. Voice traffic between the central office switch and the upstream tandem is also provisioned across fiber.

MANAGING TRAFFIC SPIKES

Lavaca Telephone Co. Inc., - Arkansas' careful capacity planning has put multiple constraints and triggers in place on its central office equipment, outside plant equipment and network backbone that will provide the company with the capability of handling traffic spikes during emergency situations.

- Usage rates are analyzed monthly by Lavaca Telephone Co. Inc., - Arkansas using reports automatically generated by the switch to ensure the usage does not exceed 90% of total line capacity.
- Lavaca Telephone Co. Inc., - Arkansas monitors traffic internally on a monthly basis to insure optimal efficiency.

LAVACA TELEPHONE COMPANY, INC.
VOICE SERVICES RATE COMPARABILITY
(USAC DOCUMENT - 401704AR1010)

Voice Services Rate Comparability

Lavaca Telephone Company - Arkansas

In compliance with the 54.313 Rules, Lavaca Telephone Company - Arkansas must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2016 Urban Rate Survey conducted by the FCC's Wireline Competition Bureau, the rate floor for voice services is \$21.93, and the reasonable comparability benchmark for voice services is \$41.07¹.

The rates shown on the Voice Pricing Form (0700) are below \$41.07. Consequently, Lavaca Telephone Company - Arkansas meets the above mentioned requirement.

¹ WIRELINE COMPETITION BUREAU ANNOUNCES RESULTS OF 2016 URBAN RATE SURVEY FOR FIXED VOICE AND BROADBAND SERVICES, POSTING OF SURVEY DATA AND EXPLANATORY NOTES, AND REQUIRED MINIMUM USAGE ALLOWANCE FOR ETCS SUBJECT TO BROADBAND PUBLIC INTEREST OBLIGATIONS; WC Docket #10-90, DA 16-362 Released April 5th, 2016

LAVACA TELEPHONE COMPANY, INC.

LIFELINE PLAN

(USAC DOCUMENT - 401704AR1210.PDF)

**Lavaca Telephone Company dba
Pinnacle Communications
Lifeline Plan – Arkansas**

Pinnacle Communications offers Lifeline Telephone service to its customers. The eligibility criteria for Lifeline is indicated on the attachment. If eligible, a credit of \$9.25 is applied to the charges for the Federal Subscriber Line Charge and Basic Local Exchange Service.

The rate for Basic Local Exchange Service for Pinnacle customers in Arkansas, before Lifeline credits is \$16.00. Pinnacle customers receive unlimited local calling as part of the Basic Local Exchange Service Plan.

No other credits are applied to rates for remaining services, including toll service (if the customer doesn't have toll limitation service). Lavaca's toll rate plans and prices are attached.



*You may qualify if:
You are not declared a dependent
for federal income tax purposes,
and/or you receive benefits from
one of the following programs:*

Lifeline

- Food Stamps
- Temporary Assistance to Needy Families (TANF)
- Supplemental Security Income (SSI)
- Medicaid
- Federal Public Housing Assistance (FPHA)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- You may also qualify based upon your income

How to sign up:

Visit our business office located at **301 HWY 96 SW** today and pick up a form. You may also visit our web site pinncom.com and print a copy as well. Mail the completed form and supporting documents to:
Lifeline/Link-Up Administrator
PO Box 685
Parsippany, NJ 07054-0685
Start receiving benefits with your next bill. Benefits may not be seen until the second bill after the initial request.

Lifeline

Lifeline is a telephone service assistance program designed to provide eligible residential customers with a credit to be applied to the price of basic local exchange service.

The Lifeline credit does not apply to custom or class calling features, long distance calling charges or plans, or internet service. All optional features and plans will be billed at full price.

**Yes, YOU can
afford telephone
service...let us
show you how!**

**PINNACLE Communications
Lavaca, AR 72941
(479) 674-2211**

NATIONWIDE CALLING PLANS

(excluding Alaska & Hawaii)

500 Minutes - \$19.95

800 Minutes - \$29.95

1200 Minutes - \$39.95



Calling plans not available in all service areas. Call your local office for more details.

1-877-817-6744

LAVACA TELEPHONE COMPANY, INC.

MILESTONE CERTIFICATION

(USAC DOCUMENT - 401704AR3010.PDF)

Progress Report on 5 Year Plan

Line 3010(b) - Milestone Certification

Lavaca Telephone Company - Arkansas certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 4Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within a reasonable amount of time.

LAVACA TELEPHONE COMPANY, INC.
CONSOLIDATED FINANCIAL STATEMENTS
(USAC DOCUMENT - 401704AR3026.PDF)



Consolidated Financial Statements
December 31, 2015 and 2014

Lavaca Telephone Company and Subsidiary

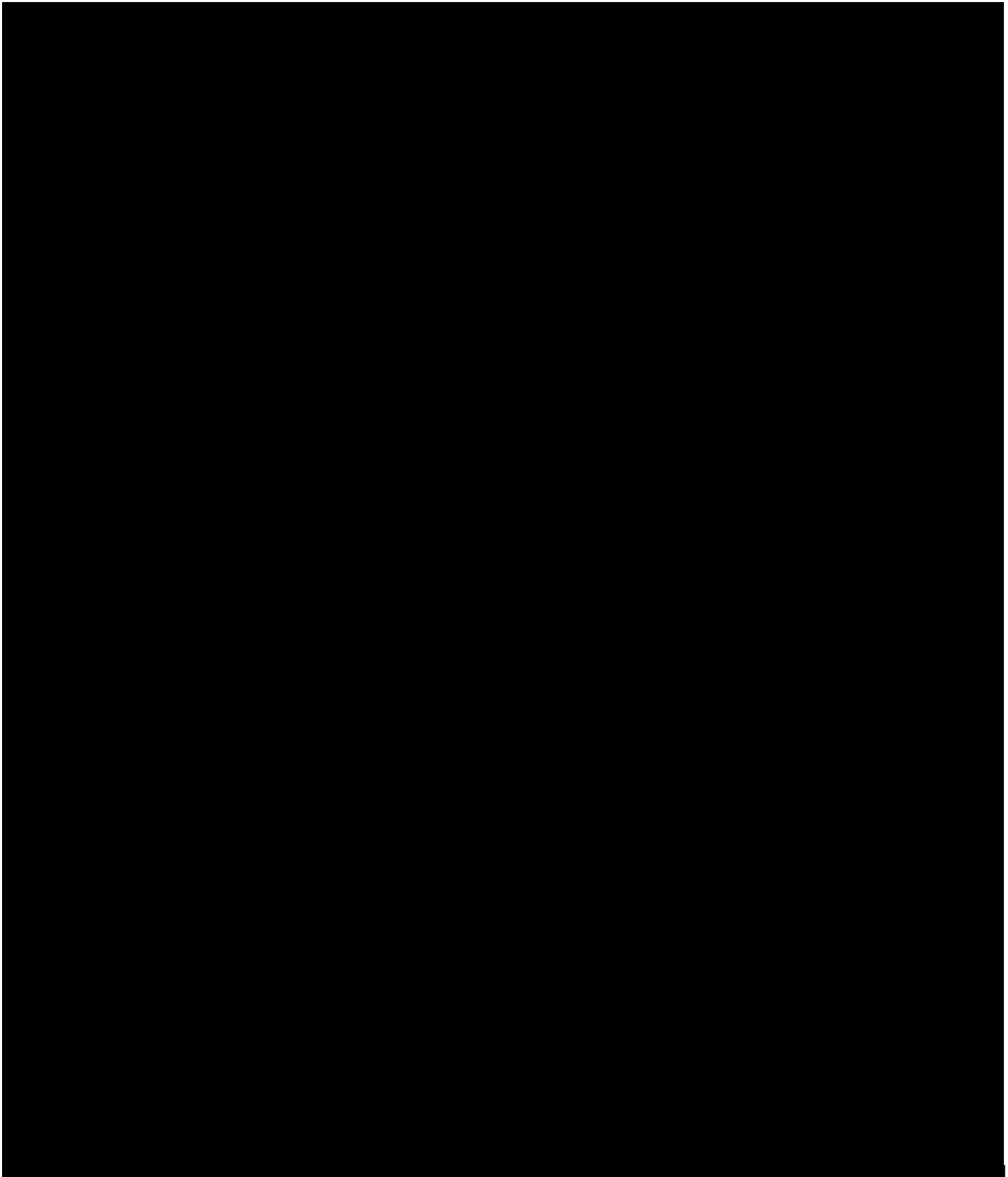
Lavaca Telephone Company and Subsidiary

Table of Contents

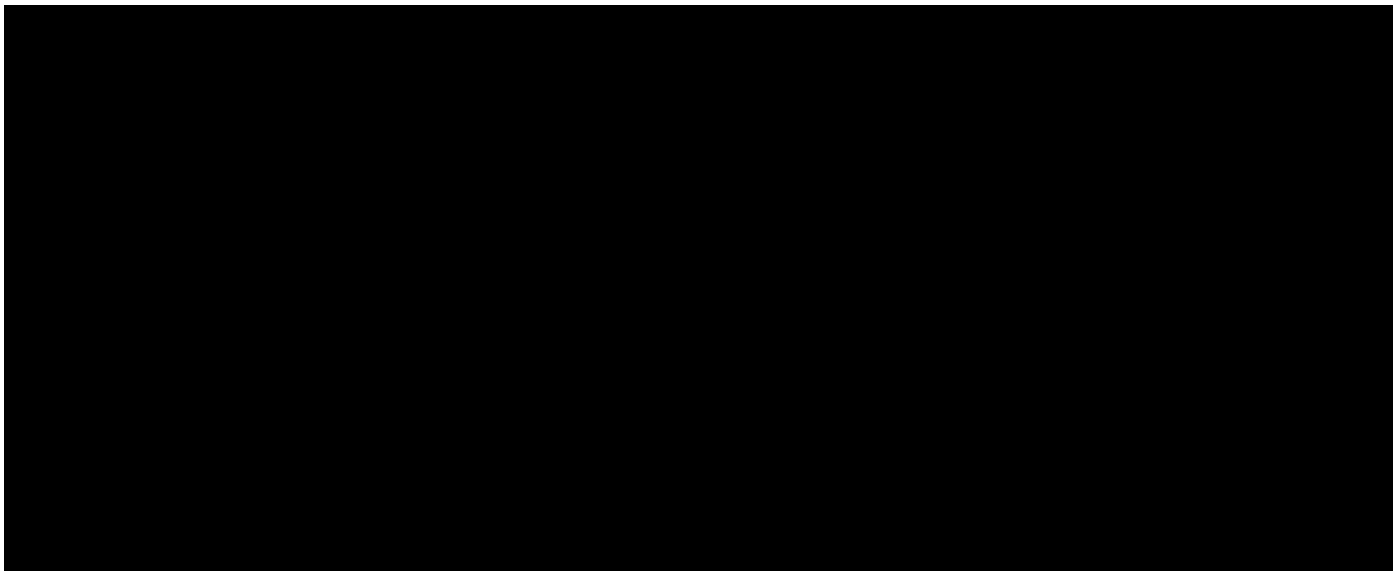
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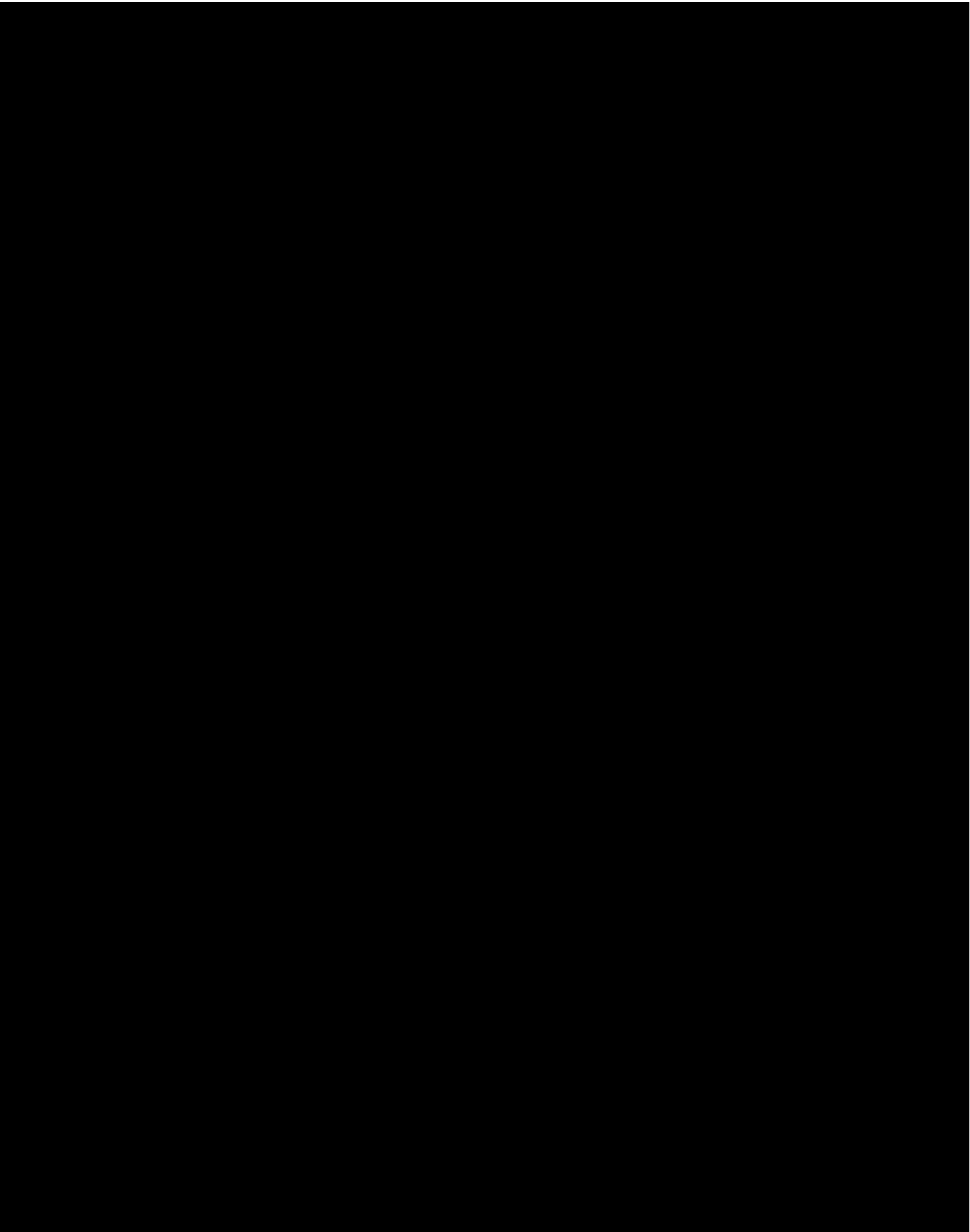
Independent Accountant's Review Report	1
Consolidated Financial Statements	
Consolidated Balance Sheets	3
Consolidated Statements of Operations	5
Consolidated Statements of Comprehensive Income.....	6
Consolidated Statements of Stockholders' Equity	7
Consolidated Statements of Cash Flows	8
Notes to Consolidated Financial Statements.....	9
Supplementary Information	
Consolidating Balance Sheet	17
Consolidating Statement of Operations	19
Schedule of Telephone Plant in Service - Arkansas	20
Schedule of Telephone Plant in Service - Oklahoma.....	21
Schedule of Operations by State	22

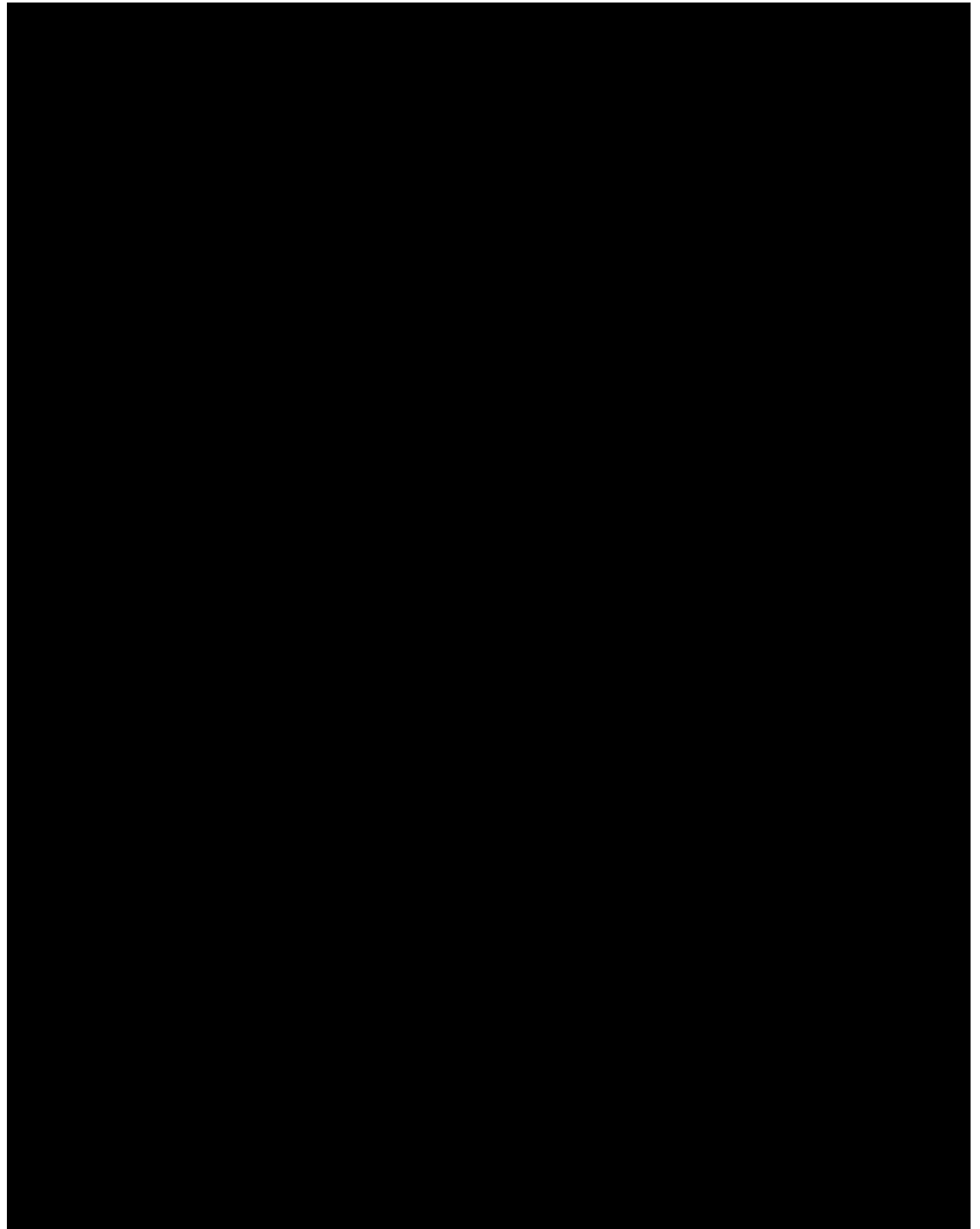
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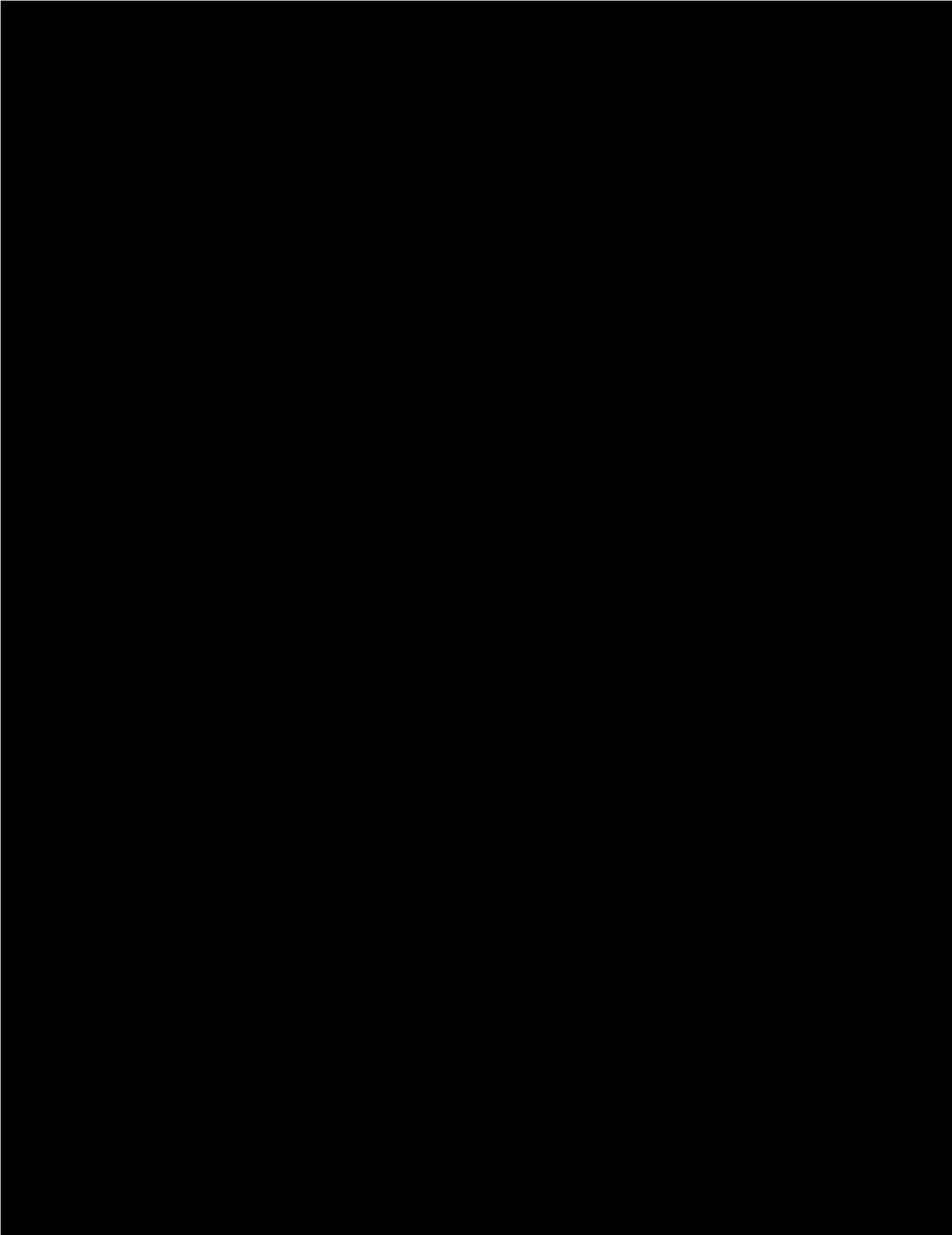


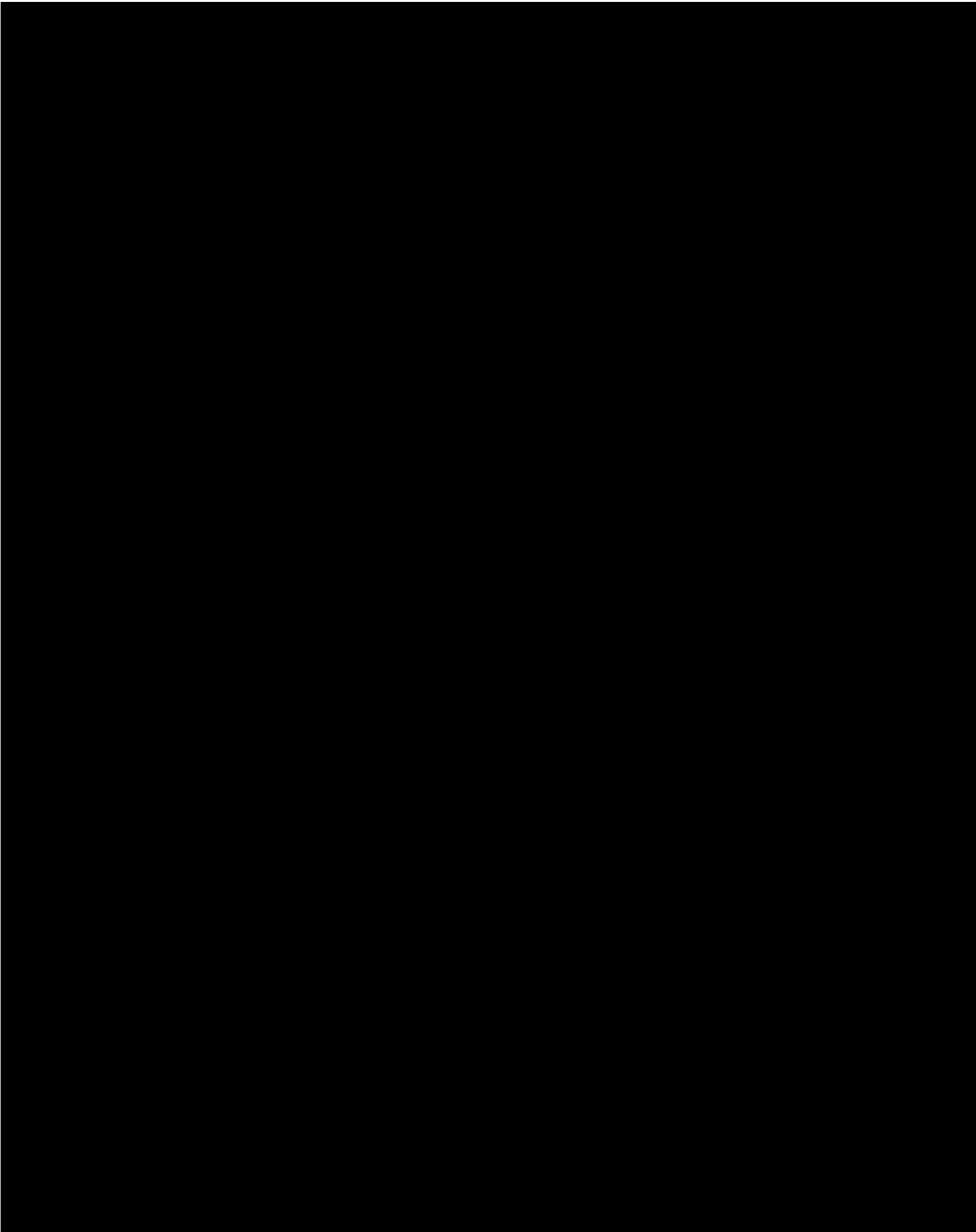
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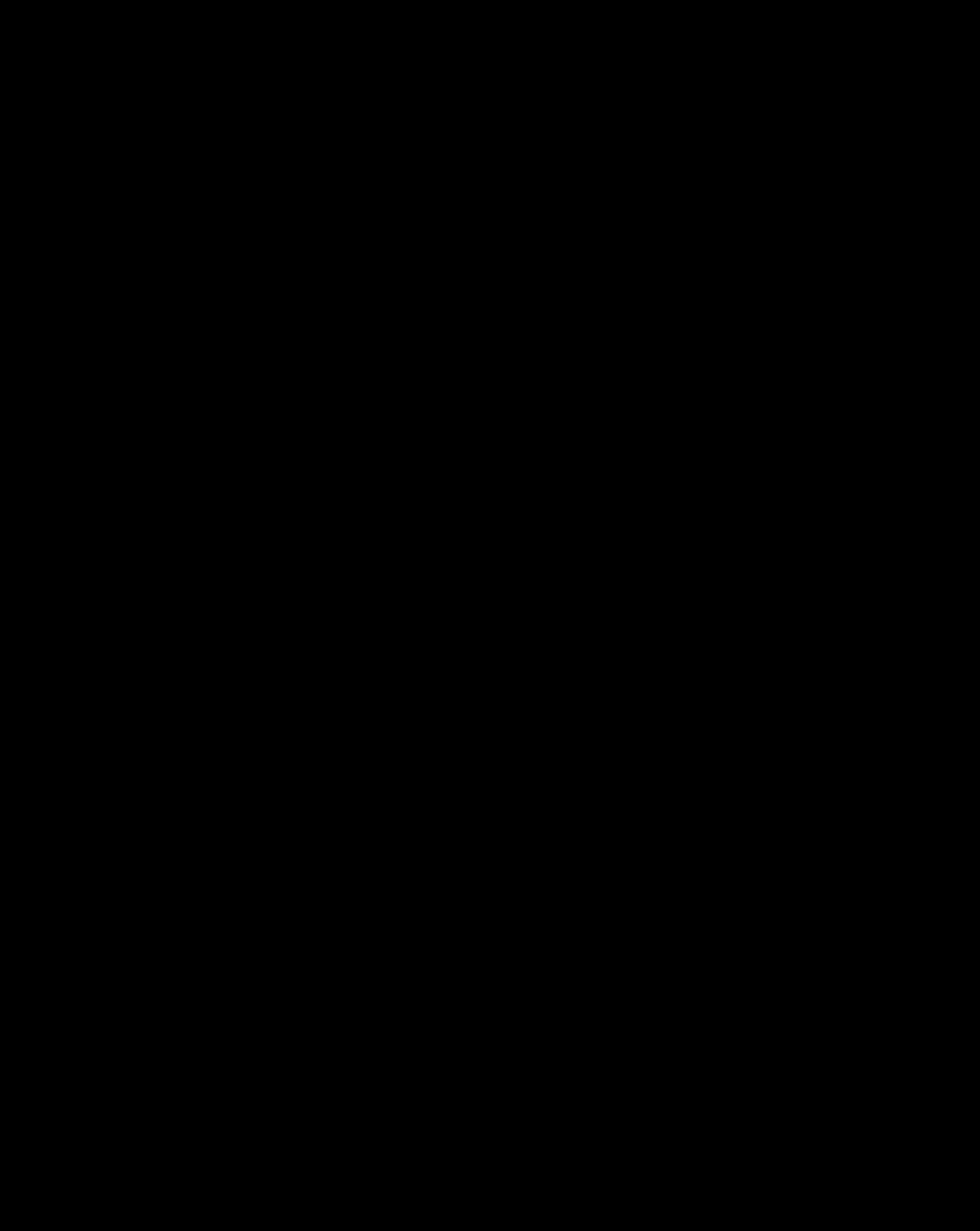


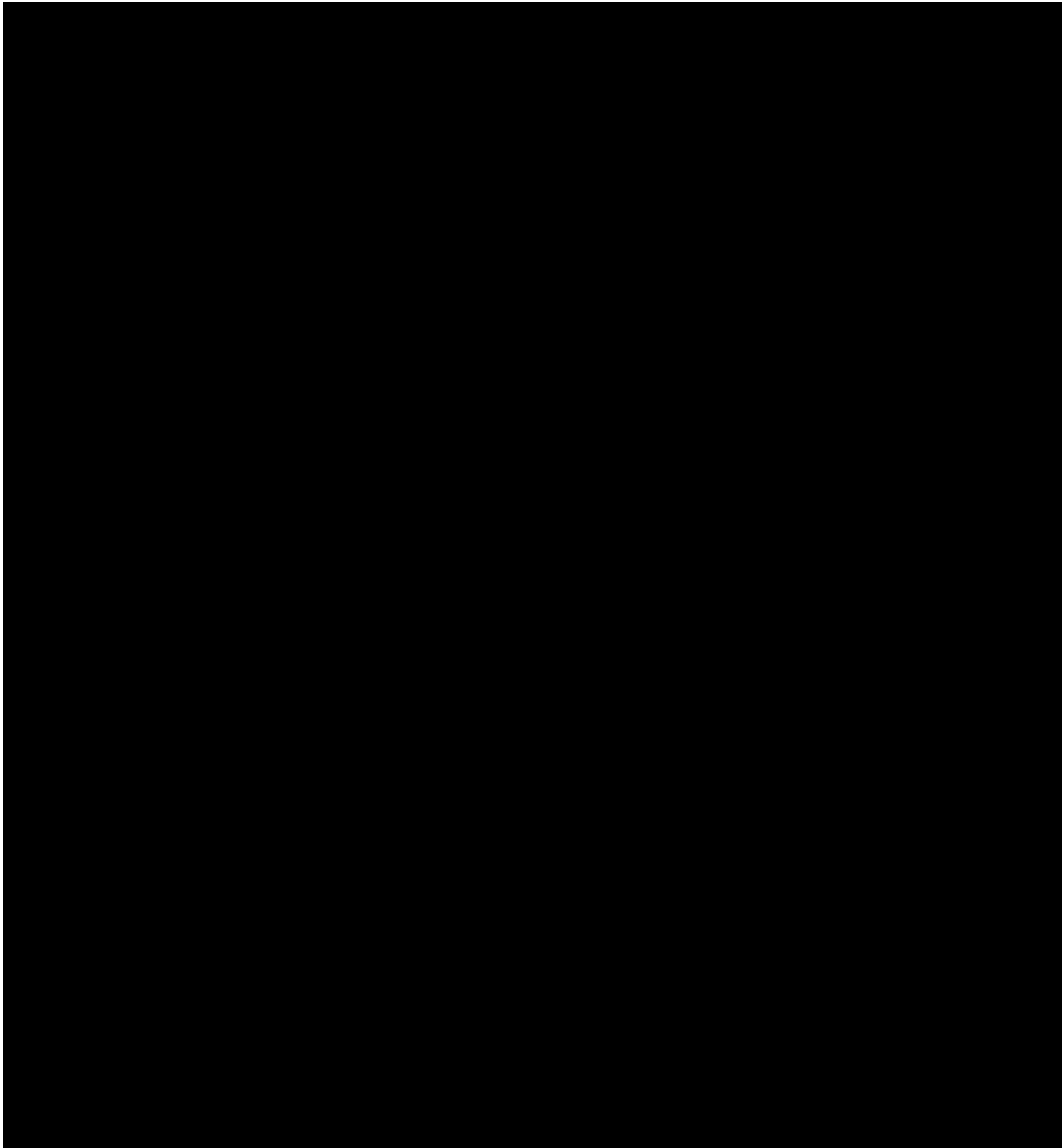




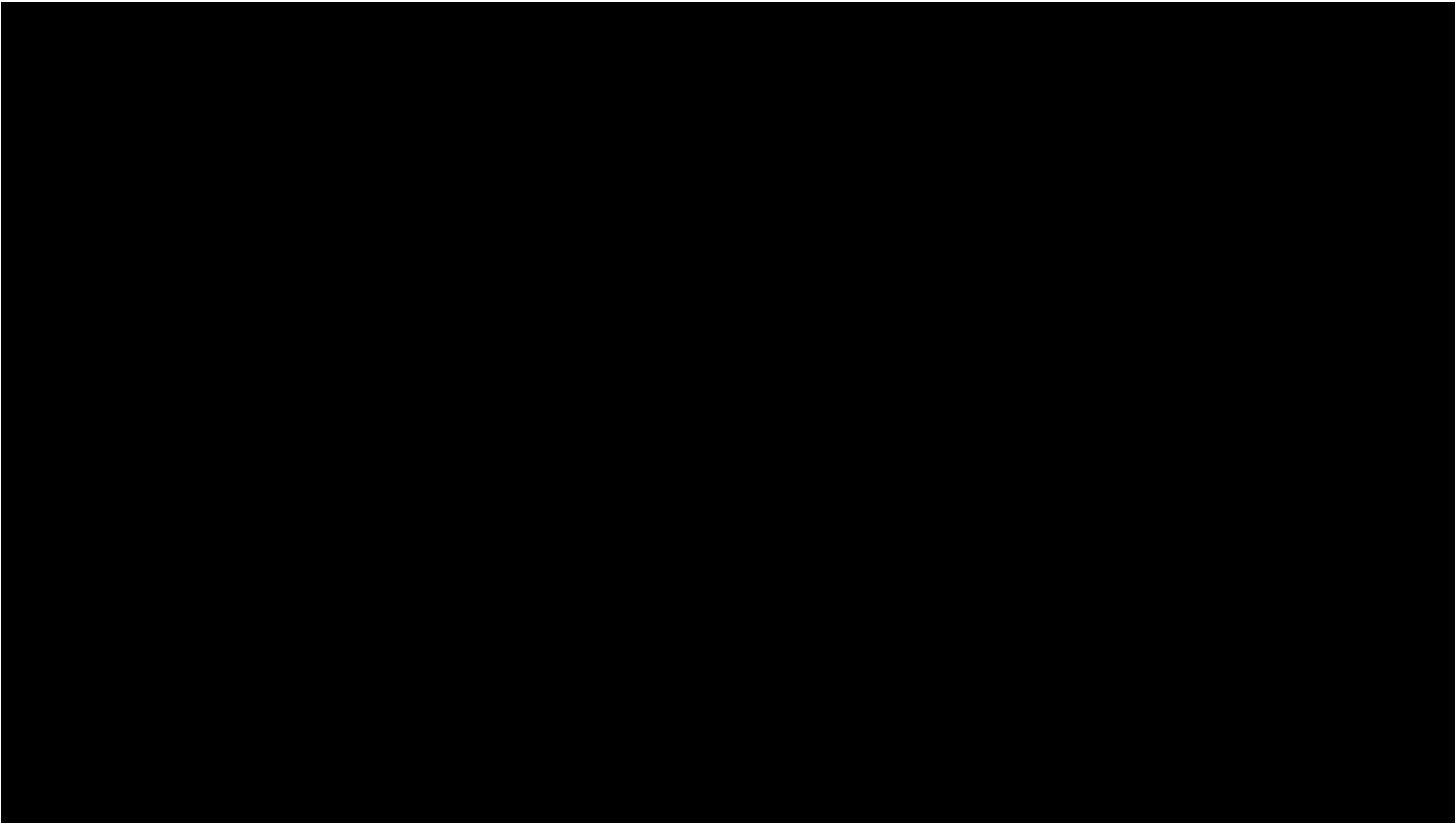


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Supplementary Information
December 31, 2015

Lavaca Telephone Company and Subsidiary

